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    DAVID P. CUSICK, #160467, TRUSTEE
    NEIL ENMARK, #159185, attorney for Trustee
    TALVINDER S. BAMBHRA, #230907, attorney for Trustee
    P.O. Box 1858
    Sacramento, California 95812-1858
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    (916) 856-8000
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                          UNITED STATES BANKRUPTCY COURT
 8
                           EASTERN DISTRICT OF CALIFORNIA
                                  SACRAMENTO DIVISION
 9
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   In Re:
                                                Case No:18-20134-C-13C
                                                DCN: DPC-1
    SHANNON EUGENA GENZEL
11
                                                TRUSTEE'S MOTION TO DISMISS
12
                                               CASE
13
                                                                  July 11, 2018
                                               DATE:
14
                                               TIME:
                                                                  9:00 AM
                                               JUDGE:
                                                                  CHRISTOPHER M. KLEIN
15
                                   Debtor(s)
                                               COURTROOM: 33,6TH FLOOR
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      DAVID P. CUSICK, STANDING CHAPTER 13 TRUSTEE, hereby moves the Court for an order
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   dismissing this case pursuant to 11 U.S.C. §1307(c) as:
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      The debtor is in material default with respect to the term of a confirmed plan, 11 U.S.C. §1307(c)
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   (6).
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      To date the debtor has paid a total of $3,160.00, with the last payment received on March 27, 2018.
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   The Trustee shows a total of $6,385.76 is due, so the debtor is delinquent $3,225.76 in plan payments.
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   Debtor's monthly payment is $1,596.44. Prior to the hearing in this matter, another payment of
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   $1,596.44 will come due. As a result debtor will need to pay $4,822.20, in order to bring this plan
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   current by the date of the hearing. The debtor must be current under all payments called for by any
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1 | pending Plan, Amended Plan or Modified Plan as of the date of the hearing on this motion or the case may be dismissed. Date Power of the following payments in the above referenced case: 580.00 Feb 27, 2018 # \$ 1,580.00 Mar 27, 2018 WHEREFORE, the Trustee asks that the Court grant an order dismissing this proceeding. Dated: June 07, 2018 Talvinder S. Bambhra, Attorney for Trustee